



**BOULT • CUMMINGS  
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TN REGULATORY AUTHORITY  
February 7, 2003

Joe Werner  
Chief, Telecommunications Division  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

Re: In the Matter of Petition of Tennessee UNE-P Coalition to Open a Contested  
Case Proceeding To Declare Unbundled Switching An Unrestricted Unbundled Network  
Element

Docket: 02-00207

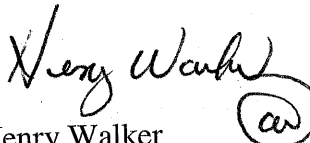
Dear Joe:

On behalf of Birch Telecom of the South Inc. is the response to your October 25, 2002 letter.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

  
Henry Walker

HW/jh

**RESPONSES OF BIRCH TELECOM OF THE SOUTH, INC.**

To assist the Authority in its evaluation of Docket 02-00207, *Petition of the Tennessee UNE-P Coalition to Open A Contested Case Proceeding to Declare Unbundled Switching An Unrestricted Unbundled Network Element*, it is requested that you respond to the following questions. Pursuant to the October 23, 2002 *Order on October 2, 2002 Status Conference and Subsequent Filings ("Status Conference Order")*, responses to this request should be filed in a sealed envelope with the notation that the contents are protected pursuant to said order. The *Status Conference Order* further holds that members of the Authority's staff will be the only individuals that inspect the responses to this data request unless otherwise ordered. A member of the Authority's Staff will aggregate your response to this request with the responses gathered from other competitive carriers for the purpose of filing summary information for use in the above referenced docket.

1. Identify each switch that you own or operate to provide local exchange service in the State of Tennessee, including, but not limited to, switches outside Tennessee. In answering this request, please describe with particularity for such switch:
  - (a) the specific location of the switch;
  - (b) the functions and capabilities of the switch;
  - (c) the geographic area served by the switch;
  - (d) the total number of access lines or equivalent lines the switch is capable of serving;
  - (e) the total number of access lines or equivalent lines the switch is currently serving;
  - (f) divide the total number of lines provided in the response to request (e) into the following three categories: number of analog lines, number of DS 1 lines, and the number of DS3 (or above) lines; and
  - (g) if the total number of voice grade equivalent lines assigned to each category in (f), using conventional conversion ratios of 24:1 for DS 1 and 672:1 for DS3 is different from the number of equivalent lines provided in response to question (e) please explain the discrepancy.

**ANSWER:**

**Birch does not own or operate any switches in the state of Tennessee.**

2. State the total number of switching points of interface you have deployed in the State of Tennessee for the collection of traffic associated with local exchange service and identify the location of each such switching point of interface.

**ANSWER:**

**N/A – see answer to Question 1.**

3. Do you currently provide local exchange service to end-user customers in Tennessee with less than four voice grade (DSO) equivalents or lines? If the answer to this question is affirmative, state:

- (a) the total number of end user customers with less than four voice grade lines or equivalents currently served;

**ANSWER: 8,099 customer locations**

- (b) the number of such access lines or equivalent lines that are located: (i) in the "density zone 1" central offices in the Nashville Metropolitan Statistical Area ("MSA"); and (ii) in the Nashville MSA; and (iii) outside the Nashville MSA;

**ANSWER: (I) 4,856 (all access line data is current as of February 5, 2003)**

**(ii) 5,001**

**(iii) 9,070**

- (c) the number of such access lines or equivalent lines that you currently serve in Tennessee using: (i) UNE-P purchased from BellSouth; (ii) resold telecommunications services from BellSouth; (iii) your own facilities; and (iv) your own facilities in conjunction with facilities purchased from BellSouth or a carrier other than BellSouth; and

**ANSWER: 26,068 access lines are provisioned utilizing UNE-P which constitutes all Birch access lines in Tennessee.**

- (d) the number of such access lines or equivalent lines that you currently serve in the "density zone 1" central offices in the Nashville MSA using: (i) UNE-P purchased from BellSouth; (ii) resold telecommunications services from BellSouth; (iii) your own facilities; and (iv) your own facilities in conjunction with facilities purchased from BellSouth or a carrier other than BellSouth.

**ANSWER: (I) 4,856**

**(ii) 0**

**(iii) 0**

**(iv) 0**

4. Do you currently provide local exchange service to end-user customers in Tennessee with four or more voice grade (DSO) equivalents or lines? If the answer to this question is affirmative, state:

- (a) the total number of end-user customers with four or more voice grade (DSO) equivalent or lines currently served;

**ANSWER: 2,171 customer locations**

- (b) the total number of end-user customers with four or more voice grade (DSO) equivalents or lines currently served by you that are located: (i) in the "density zone 1" central offices in the Nashville Metropolitan Statistical Area ("MSA"); and (ii) in the Nashville MSA; and (iii) outside the Nashville MSA; and

**ANSWER: (I) 3,754**

**(ii) 3,867**

**(iii) 8,130**

- (c) the total number of end-user customers with four or more voice grade (DSO) equivalents or lines currently served by you using: (i) facilities purchased exclusively from BellSouth; (ii) resold telecommunications services from BellSouth; (iii) your own facilities; and (iv) your own facilities in conjunction with facilities purchased from BellSouth or a carrier other than BellSouth.

**ANSWER: (I) 2,171**

**(ii) 0**

**(iii) 0**

**(iv) 0**

5. Have you purchased switching from a telecommunications carrier other than BellSouth in providing local exchange service to end-user customers? If the answer to this question is affirmative, name the provider(s) of switching.

**ANSWER: No.**

6. If the response to question 5 (above) is negative, please:

- (a) state whether you have ever investigated or otherwise considered purchasing switching from a carrier other than BellSouth, and, if so, the results of such investigation or consideration;

**ANSWER: In the past, Respondent has evaluated the prospect of purchasing local exchange switching from a carrier other than BellSouth. However, Respondent knows of no entity other than BellSouth that if offering local switching on a wholesale basis to CLECs like Respondent within Tennessee. Even if such an alternative were available in limited areas, because of the operational complexities inherent in such an arrangement, it would not be prudent to devote what limited resources are available to such an uncertain, risky, and non-ubiquitous alternative.**

- (b) state whether you have ever request switching from a carrier other than BellSouth, and, if so, the reason for such request and the reasons why you decided not to purchase switching from such carrier.

**ANSWER: No.**

7. Identify carriers other than BellSouth, of which you are aware, that offer switching in Tennessee.

**ANSWER: Birch is unaware of any carriers other than BellSouth that offer switching in Tennessee on a wholesale basis.**

8. State all carriers that have purchased switching from you in Tennessee.

**ANSWER: None.**

9. Identify all carriers that have made inquiries to you regarding the purchase of switching in Tennessee.

**ANSWER: None.**

Please furnish your response to this data request by Friday, November 8, 2002. If you have any questions in reference to this request, contact Jerry Kettles at (615) 741-2791, extension 153.

**\*\*\*\*\*PROPRIETARY & CONFIDENTIAL\*\*\*\*\***